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ABSTRACT

This study analyzed the special education program evaluation practices of 49 states and the District of Columbia based on states' required reporting under Part B of the Individuals with Disabilities Education Act and on state plans. Comparison of the results with those from a 1984 study suggests the following trends: (1) an increase in the number of states that discuss compliance monitoring in the annual evaluation sections of the State Plan and Part B Performance Report; (2) an increase in the number of states that describe a two-tiered approach to the annual evaluation requirement, whereby the local education agencies (LEAs) have specific evaluation requirements and the state has specific monitoring requirements; (3) an increase in the number of states that encourage LEA "self-study" as a pre-monitoring tool or evaluation tool; and (4) an increase in the number of states that provide technical assistance to LEAs to help them evaluate their programs and procedures. Fourteen states are conducting statewide evaluations of special education. Some states are investigating ways of collecting data on student performance outcomes. Ninety-four percent of states continue to use compliance monitoring procedures as a program evaluation tool. Three recommendations are offered: a renewed emphasis on program evaluation for determining special education effectiveness; technical assistance in program evaluation at state and local levels; and avoidance of legal restrictions on the types of program evaluations that can be conducted.

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STATE PROCEDURES FOR THE EVALUATION OF SPECIAL EDUCATION PROGRAM EFFECTIVENESS

Patricia Gonzalez, Ph.D.

Project FORUM

August 1992

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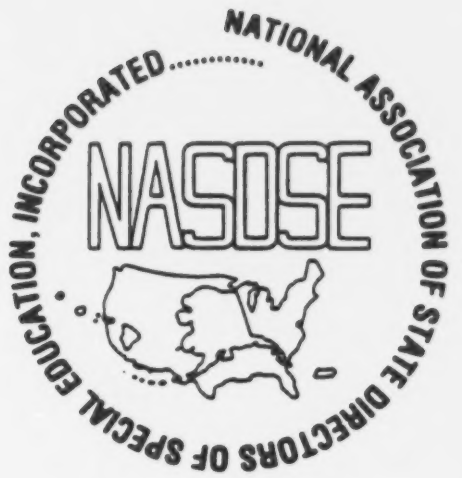

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STATE PROCEDURES FOR THE EVALUATION OF SPECIAL EDUCATION PROGRAM EFFECTIVENESS

Executive Summary

The purpose of this study was to begin to examine the efficacy of program evaluation under the IDEA by describing the methods currently used by States to conduct their annual evaluation of program effectiveness. Information on the evaluation practices of 49 States and the District of Columbia was collected from the annual evaluation sections of States' IDEA Part B Performance Reports for 1989-90 and State Plans for the implementation of the IDEA covering the 1992 school year. A comparison of the results from this study to those from a 1984 NASDSE study on this topic suggests the following trends:

- An increase in the number of States that discuss compliance monitoring in the annual evaluation sections of the State Plan and Part B Performance Report.
- An increase in the number of States that describe a two-tiered approach to the annual evaluation requirement, whereby the LEAs have specific evaluation requirements and the State has specific monitoring requirements.
- An increase in the number of States that encourage LEA "self-study". This practice was described by different States as a pre-monitoring tool or an evaluation tool.
- An increase in the number of States that provide technical assistance to LEAs to help them evaluate their programs and procedures.

Documents reviewed for this investigation indicate that 16 States are supporting short-term studies, sometimes using IDEA-B discretionary monies, to evaluate specific issues, projects, and/or practices in special education. An additional 14 States have begun to conduct or fund statewide evaluations of special education, including studies that focus on the post-school status of graduates and on the effectiveness of transition services.

The Individualized Education Program (IEP) is receiving evaluative attention in all States. In order to evaluate the IEP, States select among three general strategies: (a) evaluation based on the annual review process, (b) evaluation by the LEA along with compliance monitoring by the SEA (i.e., the two-tiered approach), and (c) evaluation by the SEA, usually collecting data from a sample of IEPs.

Some States have begun to investigate ways of collecting data on student performance outcomes for the purpose of evaluating the effectiveness of special education. Four States, Indiana, Michigan, Oklahoma, South Carolina, specifically mention producing comprehensive technical assistance or guidance documents that *encourage* LEAs to use student outcomes in their evaluation activities. Three States, Vermont, Utah, and West Virginia, report a process in place

for collecting statewide information on student outcomes for evaluation purposes. Four more States, Connecticut, Delaware, Kentucky, and Maryland, indicate they are in various stages of implementing such a process.

Perhaps the finding of broadest significance for using evaluation to improve special education programs and practices is that the majority of States (94 percent) continue to use compliance monitoring procedures as a program evaluation tool. In some States, there are clear implications that the findings from compliance monitoring are used as evidence of the effectiveness of special education programs and services, and that corrective action following compliance monitoring is equated with implementing program improvements. Thus, the documents reviewed suggest that program evaluation and compliance monitoring frequently are viewed as the same activity.

There appear to be several reasons why States have not clearly differentiated between evaluation and compliance monitoring activities. First of all, the Federal requirements to "evaluate the effectiveness" of special education programs, as expressed in both statute and regulation, provide no elaboration on how this type of evaluation process is to be conducted, what data is to be collected, or how it is to be analyzed or reported. Second, it is administratively efficient for many States to use, for as many purposes as possible, the voluminous amounts of data that *must be* collected during compliance monitoring and fiscal audits, the child count, and other Federal data reporting requirements. A third possible factor influencing the apparent emphasis on "monitoring as evaluation" is that expertise in program evaluation may not be readily available in many SEAs or LEAs. At the State level, it clearly takes more than just knowledge of evaluation methods; it takes the equipment, personnel, and statistical expertise to do meta-analyses of data on multiple variables supplied from multiple sources.

The findings from this study on the status of States' annual evaluation practices, when combined with the reasoning expressed above, suggest several recommendations for future policy and practice.

- **There should be a renewed emphasis on program evaluation as a necessary tool for determining the effectiveness of special education programs and services and making informed decisions concerning program improvement.** This is not to say that compliance monitoring should be discontinued. However, consideration might be given to promoting a balance between the human and fiscal resources necessary for conducting compliance monitoring and program evaluation at all levels of special education administration based upon their relative contribution to improving outcomes for children and youth with disabilities.

- **Technical assistance in the area of program evaluation is needed at the SEA and LEA levels.** Expanding the focus of monitoring activities to include program evaluation, as the first recommendation suggests, will not necessarily change the

amount of effort required for data collection. It has the potential, however, to make the data much more useful as long as there is a certain level of expertise available to interpret, report, and make the improvements the data suggest.

- **State and Federal laws and regulation should be phrased so as to avoid restricting the types of program evaluations that can be conducted by SEAs and LEAs.** As the implementation of the IDEA continues to evolve in the coming years, the questions of critical importance to improving program quality, as well as determining program effectiveness, will need to reflect changes in many aspects of the educational system as well as national standards and community values.

STATE PROCEDURES FOR THE EVALUATION OF SPECIAL EDUCATION PROGRAM EFFECTIVENESS

Introduction

Two pieces of legislation form the Federal mandate for evaluating special education programs and services that States provide under Part B of the Individuals with Disabilities Education Act (IDEA). The IDEA requires each State Plan to "provide for procedures for evaluation at least annually of the effectiveness of programs in meeting the educational needs of children with disabilities (including evaluation of individualized education programs)..." (Section 1413(a)(11)). In addition, Section 435(b)(4) of the General Education Provisions Act (GEPA) calls for the State to evaluate the effectiveness of covered programs (including the IDEA) at least every three years.

While there are Federal requirements for evaluation, and often State requirements as well, there are many SEAs and LEAs that evaluate special education programs and services expressly for the benefits this type of information can provide. To illustrate, Wentling (1989) suggests five purposes of evaluation that have applicability to the administration of special education. First, evaluation results can be used *to convince or gain support*. Evaluation results can make a significant contribution to a rationale for allocating resources, revising the regulatory structure, or establishing policy in new areas. Decisionmakers can be swayed by convincing evidence, and evaluation provides a mechanism for obtaining data to support a position, pro or con.

Second, evaluation results can be used *to educate or promote understanding*. There are many people who are unaware of or who do not understand the goals, procedures, and successes of special education. The need to "promote" special education through evaluation of its outcomes is particularly acute in times of leveling or declining fiscal resources occurring in the midst educational restructuring. A third potential benefit of program evaluation is *securing the involvement of key individuals*. Sharing the results of an evaluation is an excellent way to spark the interest and obtain the commitment of people (e.g., boards of education, parents, other agency personnel) who can assist in implementing the recommendations.

Wentling's fourth and fifth uses for evaluation results are perhaps the ones most commonly associated with evaluation - *to improve programs* and *to demonstrate accountability*. Both concepts have received a great deal of attention in the past decade. Concomitantly, there has been increasing pressure from politicians, professionals, and the general public to define and promote education outcomes for all our nation's school children[1]. The 1990s has begun as a

[1] In this context, the term, "outcomes", refers to the knowledge, techniques, values, and affects that are the products of education (Schleisman & King, 1990).

decade of reform and restructuring for both regular and special education. Improving student performance outcomes has become the focus for many of these efforts. In light of the potential for change in the administration and delivery of special education in the upcoming years, it is appropriate that State administrators re-examine the status of their program evaluation procedures - Do evaluation results help to direct the future of special education? Are the standards for program success or failure to some extent based on student outcomes? Can evaluation methods be improved?

The purpose of this study is to begin to examine the efficacy of program evaluation under the IDEA by describing the methods currently used by States to conduct their annual evaluation of program effectiveness. This report provides information on current and developing practice in evaluation, including the use of student outcome measures, that may be shared among States and the Regional Resource Centers (RRC). Specific recommendations for changes in evaluation requirements are described in the concluding section of this report. The results of this study can facilitate OSEP's efforts to provide information and technical assistance for program improvement under Section 618 of the IDEA and further serve as a "baseline" against which future improvements in States' annual evaluation practices may be measured.

Method

Source Documents

Information on the evaluation practices of 49 States and the District of Columbia comprise the data for this study. The primary data sources were States' IDEA Part B Performance Reports for 1989-90 and State Plans for the implementation of the IDEA covering the 1992 school year. The Performance Reports were unavailable for four States; however, it was felt that the State Plans provided enough information to include these States in the study. Neither source document was available for one State and it was omitted from the study.

Data Collection

Using the annual evaluation sections of the source documents, data collection proceeded with two rounds of content analyses. In the first round information was collected from each State's documents regarding (a) the program components being evaluated, (b) the type of data collected, (c) the data collection and data analysis procedures employed, (e) the use of the data for program improvement, and (f) the use of student outcome measures. The information pertinent to each of these variables (when available) was copied directly from the source documents using the same or abbreviated wording. The annual evaluation sections of both the Performance Report and the State Plan were then attached to the form completed for each State.

A second review of the source documents was conducted in order to categorize certain aspects of States' evaluation and/or monitoring practices. This round of data collection recorded the presence or absence of certain procedural components, rather than describing processes. Table 1 provides a list of the questions used in this analysis and how the data were recorded. These particular questions were selected in order to compare similar data collected by NASDSE in April of 1984 for publication in a monograph entitled, *State Responses to the "Annual Evaluation" Requirements for State Plans.* As part of Question 5, a specific data source category (e.g., LEA application, site visit report) was marked when it was referred to in the "Annual Evaluation" section of a State's Performance Report or Plan as a data collection instrument for either monitoring, program evaluation, or both. The category, complaint reports, was added to the present study because of its prevalence in current State systems of evaluation and/or monitoring.

Table 1

Categories Used in the Secondary Analysis

1. At what levels were significant monitoring activities conducted? - SEA, LEA, or Both
2. At what levels were significant evaluation activities conducted? - SEA, LEA, or Both
3. Was there an LEA self-study component? - yes/no
4. Was the SEA offering technical assistance to the LEA in evaluation? - yes/no
5. Which of the following sources provided evaluation/monitoring data?
    a. LEA applications
    b. Site visit reports by SEA
    c. Data reports (e.g., child count)
    d. Fiscal audits
    e. Complaint reports

Results

This section of the report describes the methods currently used by the States to conduct their annual evaluation of program effectiveness. Differences between these data and those reported in 1984 in an earlier NASDSE study are discussed. Examples of independent and statewide evaluation studies funded by States are provided as part of this description. Completing this section is a summary of the results with respect to evaluation of the IEP and outcomes-based evaluation.

For the majority of States in this study, the results to follow represent a combination of the evaluation activities reported as accomplished during the 1989-90 school year and those proposed in the State Plan for the 1992 school year. The amount of detail provided in either the Performance Report or the State Plan with respect to the annual evaluation varied greatly from State-to-State. Therefore, it is possible that some States conducted or planned to conduct more activities in the area of evaluation than they chose to report. In addition, while there was a conscious effort during data collection to discriminate between compliance monitoring and program evaluation activities, it was clear that States often used the terms interchangeably. Both the lack of detail in the source documents and the lack of precision in the use of terms affect the accuracy of these results.

Monitoring as Evaluation - Then and Now

The limitations cited above notwithstanding, comparisons with the earlier NASDSE study[2] show some general trends in State program evaluation activities over the past six to eight years. For instance, in the 1984 study, most States (approximately 83 percent) chose to discuss compliance monitoring in the "Annual Evaluation" section of their Performance Reports or Plans. Similarly, in the current study, 92 percent (46) of the States mentioned compliance monitoring in this section. Four States, Utah, Minnesota, West Virginia, and Virginia[3] restricted their descriptions to program evaluation activities in the "Annual Evaluation" section of their Plans. Eight other States (i.e., New Hampshire, Vermont, Delaware, Maryland, Kentucky[3], Kansas, Nebraska, California) described significant evaluation efforts beyond monitoring. Put another way, although compliance monitoring information was mentioned as a contributor to the annual program evaluation conducted by these eight States, it did *not* appear to be the primary source of evaluation data.

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[2] The 1984 NASDSE study contained an analysis and compendium of written descriptions of the annual evaluations planned by 47 States as submitted to OSEP in their FY 1984-86 Plans.

[3] The evaluation system described in the source documents was in the planning and design stage.

From the data in this study it appears that the roles assigned to the LEA and SEA in monitoring and evaluation also have shifted somewhat since 1984. In the first study NASDSE reported that approximately 11 States (one quarter of the sample) described a two-tiered arrangement with the LEAs, whereby the LEAs had specific evaluation requirements and the State had specific monitoring requirements. In the current study 25 States, or half the sample, were reporting this type of system. Montana's 1990-1992 State Plan (p. 94) provides a concrete example of a two-tiered system. It contains the following statement:

> Two methods of evaluating local education agency programs are:
>
> (1) Local education agencies submitting annual updates of program narratives, and
>
> (2) State education agency on-site visits of local education agency programs.

Accompanying this statement are citations from the *Administrative Rules of Montana* that describe the contents of the LEA program narrative and requirements for the evaluation to be conducted at the district level (e.g., type of data, evaluation design, reporting requirements). Later passages describe the on-site monitoring activities of the SEA and their role in "evaluating the general effectiveness of special education programs and services throughout the state."

Expanding upon the two-tiered evaluation system, a slightly more complex configuration was defined by three States in 1984 and by nine States in the present study. In this system the LEAs were delegated evaluation responsibilities and the SEAs had *both* evaluation and monitoring functions.

Another practice found in more States now than in the past is LEA "self-study". The 1984 NASDSE report mentioned four States engaging in this practice. In contrast, 18 States promote its use in the 1990s. From the present study, it is clear that the procedure has different purposes among the States. In several States, the LEA self-study is a pre-monitoring activity to screen for problems prior to a site visit from SEA staff. In other States, it is apparent that the role of LEA self-study goes beyond compliance monitoring and does serve a program evaluation function. For still other States, the distinction between the evaluation and monitoring functions of LEA self-study activities are not clear from the source documents. Many SEAs did and still do provide technical assistance to LEAs to help them evaluate their programs and procedures. In fact, the percentage of States that mention providing this assistance has grown from 20 percent (as reported in 1984) to 38 percent in the current study.

Because program evaluation was and continues to be equated with compliance monitoring in many States, it is not surprising that the sources of SEA "evaluation" data are frequently elements of their compliance monitoring systems. For instance, the prior NASDSE study reported that most States used LEA applications/plans and on-site visitation in their evaluation process. Exact figures from the present study are provided in Table 2.

Table 2

The Number of States Using Monitoring Elements as Sources of Evaluation Data

Monitoring Elements	Number of States
LEA Plans/Applications	34
LEA Annual Reports	10
Site Visits	42
Statewide Data Systems (e.g., Child Count)	21
Fiscal Audits	24
Complaint Reports	11

Monitoring data sources such as LEA applications, site visits, or fiscal audits provide very limited information upon which to evaluate *the effectiveness* of special education programs and services. Even in States where there were established guidelines for evaluation by the LEAs, it was often unclear as to whether the SEA performed any type of "meta-analysis", although a few States referred to "aggregating the data." In other instances, the LEA Annual Performance Report (including the evaluation data) related to documenting compliance rather than program effectiveness. While reliance on compliance documents for the annual evaluation data appears to be the norm, some States are expanding their conceptualization of what constitutes evaluation of effectiveness in special education.

Independent Evaluation Studies Funded by States

One way in which SEAs conduct evaluation involves funding short-term studies, sometimes using IDEA-B discretionary monies, to evaluate specific issues and/or practices in special education. Sixteen States described supporting studies of this type. For example, Kansas funded a study that examined the effects of classwide peer tutoring on at-risk students' subsequent placement in special education. In Minnesota, a project was funded to evaluate the relative effectiveness of direct language therapy and therapy provided through mainstream collaboration. Some States employing this evaluation format reported that the results were used to influence policy decisions, SEA technical assistance priorities, and/or CSPD plans. Thus, in these instances, States have chosen to conduct evaluations that will guide decisionmaking.

The "Annual Evaluation" sections of source documents from 10 States maintained that evaluation reports were required from projects funded by IDEA-B discretionary monies, including model projects initiated by the LEAs. While there was little direct discussion of how project evaluations of this type contributed to the overall evaluation of the effectiveness of special education, general statements from some States suggested that evaluations from individual projects had the potential to influence policy and engender support for project replication and/or continuation.

Statewide Evaluation Efforts Conducted by the SEA

The evaluation activities described above usually targeted a specific project, curriculum, or issue that may or may not have implications statewide. In approximately 14 SEAs, however, efforts to conduct or fund statewide evaluation of special education procedures have begun. In Iowa, for instance, a five-year statewide follow-up study of special education graduates has been supported by the SEA using Part B discretionary funds. Also, Maryland is supporting a statewide evaluation study of the status of transition services in schools and community colleges. A burgeoning interest in evaluation at the SEA level has been demonstrated in Minnesota and Illinois through the establishment of evaluation units within the departments of education.

Although it was clear from the materials reviewed for this study that some SEAs actively were engaged in program evaluation activities, very little detail was provided in the source documents as to the evaluation procedures SEAs were using or proposing to use. Descriptions particularly were lacking for data collection procedures, data analyses, and criteria for judging effectiveness[4]. One possible reason for the limited information on the procedures used in program evaluation was that in some States the topic(s) under study at the SEA level were selected on an annual basis. This practice would preclude describing the topics and specific evaluation methods in the State Plan. In Missouri, for instance, the topic for evaluation was selected annually based upon the results of SEA monitoring activities, the needs assessment data from CSPD, and other sources. Similarly, Minnesota conducted formal studies on "critical" issues as needed, and in West Virginia, a small number of evaluation questions were selected annually for the purpose of determining the State's progress in meeting certain statutory objectives.

In another example, the California Education Code calls for annual evaluation studies of issues of statewide concern in special education. These studies may include, but are not limited to, (1) Pupil performance, (2) Placement of pupils in least restrictive environments, (3) Degree

[4] Considerably more information on procedures could be gleaned from State documents where compliance monitoring was equated with evaluation. For these States, it was relatively clear what components were "evaluated", and what and how the data were collected (refer to Table 2). There was, however, little information on how these data were analyzed. With respect to interpreting the data, it appeared that in some cases being "in compliance" was proof of "effectiveness".

to which services identified in individualized education programs are provided, (4) Parent, pupil, teacher, program specialist, resource specialist, and administrator attitudes toward services and processes provided, and (5) Program costs.

Evaluating the Effectiveness of the IEP

While in California and other States the program components to be evaluated are determined annually, one component of special education receiving some evaluative attention in all States is the IEP which receives specific mention in the IDEA and supporting regulation. All States made some reference to "evaluating the effectiveness of the IEP" in their State Plans. Descriptions of *how* this was accomplished varied from none to several pages of procedures, questions, and reporting requirements; however, there seemed to be three general approaches to evaluating the IEP that were not mutually exclusive.

First, a few States described the *IEP review process* and other mechanisms within that process (e.g., a team monitor) as the primary means of evaluation. The implication was that effectiveness, as determined by the individual student's progress on the IEP, was evaluated by the members of the student's team using the annual review process. In contrast, a number of States described the *two-tiered approach*, discussed earlier, to evaluate the effectiveness of the IEP. The most common process generally called for the LEAs to "evaluate" the annual review process using methods described in the local annual plans. The results of this evaluation were then reported in the LEAs' annual reports to the SEA. In turn, the SEA "evaluated" the IEP by reviewing the LEA plans and reports and by on-site monitoring of the IEP process. Few States delineated how the SEA planned to evaluate the effectiveness of the IEP using the data supplied by the LEAs. However, some State documents, such as those from Iowa and Washington, described rather extensive LEA guidelines for their evaluation of the IEP.

A third approach, described by only a few States, was to *evaluate the IEP at the SEA level*, independent of evaluations at the local level. The most common method of studying the IEP process in these States was to collect a sample of IEPs from districts and analyze them on the basis of some criteria. These criteria included the IEP components delineated in 34 C.F.R §300.346, as well as the number of goals/objectives attained, parent satisfaction, and participation by vocational education and physical education among others. The District of Columbia proposed such a study in its State Plan, and South Carolina and Arkansas reported the results of similar types of studies in their 89-90 Performance Reports.

A somewhat different approach to evaluating the IEP is being piloted by Illinois during the 1991-92 school year. In this approach, there are three required components of the IEP evaluation to be conducted at the local level: (a) evaluate and report findings using the current State designated question (i.e., How often do teachers and related service providers review student's IEPs and for what purposes?), (b) evaluate and report findings using a locally

determined question, and (c) using the LEA exit report data for 1991-92, analyze the variations in the reasons for exiting of students with different disabilities and report the findings. The LEAs were given an "Evaluation Activity Guidebook" to assist in these efforts. The source documents for this study did not reveal how the Illinois SEA would compile and analyze these data.

The IEP plays a central role in planning and documenting services and in ensuring due process rights of students with disabilities. It could provide the ideal tool for identifying individual student performance outcomes and assessing student progress. In addition, the assessment of student outcomes could be used as input into an evaluation of the team process that produced the content of the IEP.

The Development of Outcomes-based Evaluation[5]

Some State departments of special education have begun to investigate ways of collecting data on student performance outcomes for the purpose of evaluating the effectiveness of special education. At least four States (i.e., Indiana, Michigan, Oklahoma, South Carolina) have produced comprehensive technical assistance or guidance documents that *encourage* LEAs to use student outcomes in their evaluation activities. Thus, the use of outcome measures by the LEAs in these States is voluntary. In contrast, Connecticut, Delaware, Kentucky, and Maryland are in various stages of implementing statewide requirements for collecting student outcome information as a basis for LEA and/or SEA evaluation.

Three States, Vermont, Utah, and West Virginia, reported a process in place for collecting statewide information on student outcomes for evaluation purposes. Vermont, for example, is developing a statewide educational assessment system for *all* children. Within this system, the performance of special education students will be measured against statewide quality indicators. In addition, over half the districts in Vermont participate in the Post School Indicators Project which uses student follow-up data to suggest areas for program improvement.

Utah has developed the Special Education Evaluation System (SEES) to assess the operation and effectiveness of special education programs in five areas: (a) student outcomes, (b) effective instruction, (c) student records (including IEPs), (d) service coordination, and (e) community involvement. The CSPD section of the LEA application in Utah is structured around the five areas of SEES. SEES data is collected locally and then organized in a standard format for analysis at both the local and State levels.

The West Virginia Special Education Evaluation Review System (SEERS) has as one of its guiding principles, "The focus of the system is upon outcomes, specifically student progress and student outcomes." Using this and the other six principles of the SEERS system, LEAs must

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[5] In this section of the report the reference to States' efforts to collect student outcome data is *in addition to* the Federal data reporting requirements.

involve major stakeholders in the planning and implementation of the evaluation and focus on at least one of the established SEERS Program Evaluation Goal Statements. These Goal Statements represent major aspects of special education, including eligibility (e.g., decisions regarding the student's eligibility are based upon established criteria), placement, assessment, the IEP (e.g., the student's IEP serves as an effective communication tool), parent involvement, and transition (e.g., after program completion, students participate fully in society). SEERS also includes a required set of components (i.e., an evaluation plan) for each local evaluation. The West Virginia Department of Education annually selects a small number of evaluation questions for the purpose of determining the State's progress in meeting one of these goal statements.

Summary and Discussion

This study describes the current status of States' efforts to evaluate special education programs and services. Some States have established a statewide system for collecting, analyzing, and reporting evaluation data to interested stakeholders. Several more States are in the planning or piloting stage of implementing such a system. Moreover, nearly one third of the States support independent evaluation projects to assess the usefulness of curricula, programs, and processes implemented to improve the delivery of special education to children and youth with disabilities.

These significant evaluation efforts notwithstanding, the results of this study also indicate that the majority of States continue to use compliance monitoring procedures as a program evaluation tool to a significant degree, and findings from monitoring activities, presumably, as evidence of the effectiveness of special education programs and services. In some States, there are clear implications that corrective action following compliance monitoring is equated with implementing program improvements. If what States describe in their State Plans and Performance Reports accurately reflects their annual program effectiveness evaluation procedures, it seems as though program evaluation and compliance monitoring frequently are viewed as the same activity.

There appear to be several reasons why States have not clearly differentiated these activities. First of all, the Federal requirements to "evaluate the effectiveness" of special education programs, as expressed in both statute and regulation, provide no elaboration on how the evaluation process is to be conducted, what data is to be collected, or how it is to be analyzed or reported. There also has been very little guidance with respect to the content of the "Annual Evaluation" section of the State Plan.

Second, it would seem natural for many States to want to use, for as many purposes as possible, the voluminous amounts of data that *must be* collected during compliance monitoring and fiscal audits, the child count, and other Federal data reporting requirements. The collection

of these data require a great deal of effort on the part of both the LEA and the SEA. Consequently, using it for more than one purpose is cost effective.

A third possible factor influencing the apparent emphasis on "monitoring as evaluation" is that expertise in program evaluation may not be readily available in many SEAs or LEAs. A certain amount of skill and knowledge are required to construct an effective evaluation plan at any level within a system. At the State level, it clearly takes more than just knowledge of evaluation methods; it takes the equipment, personnel, and statistical expertise to do meta-analyses of data on multiple variables supplied from multiple sources.

Regardless of the reasons behind equating program evaluation with compliance monitoring, it is important to remember that monitoring data may contribute information to the evaluation process, but by itself, it does not indicate the quality or effectiveness of special education services. As DeStefano (1990) stated, "Compliance monitoring simply assesses the extent to which a program adheres to a set of standards. It does not in and of itself give a comprehensive picture of the program or evaluate program effectiveness" (p. 230).

The Influence of Student Outcomes on SEA Evaluation

With the growing emphasis on accountability, the measurement of goals and establishment of high performance standards in an era of educational reform, it is not surprising that several States are looking at student performance outcomes as a measure of program effectiveness. Determining effectiveness is the function of summative evaluation. Patton (1986) tells us that "summative evaluation questions are these: Has the program been effective? Should it be continued? Is it worthwhile? Did the program bring about (cause) the desired outcomes?" (p. 66). The answers to these questions are often useful in determining whether or not to continue supporting a particular program or project. They do not, unfortunately, provide information on how to improve the program or project. To accomplish this, a formative evaluation needs to be conducted using a different set of questions and often different data. Questions usually posed in a formative evaluation are: "What are the strengths and weaknesses of the program? How can the program be improved? What's working well and what isn't working so well? What are the reactions of clients, staff, and others to the program?" (Patton, 1986, p.66).

During the course of the OSEP Annual Leadership Conference held in April, 1992, several State Directors of Special Education were heard to decry the overall inability to use existing data for program improvement. The problem is, of course, that a large amount of the data States' collect for compliance monitoring and Federal reporting purposes cannot answer formative evaluation questions. There must be a conscious effort to collect data that address both program improvement and program effectiveness evaluation issues. Also apparent, is the critical need to define more precisely a formative and summative evaluation system for special education.

Recommendations

State and local implementation of P.L. 94-142 began in the 1970s with an emphasis on establishing fundamental policy and procedural structures necessary to assure access to public education for children with disabilities. Compliance monitoring was a necessary force in securing the newly granted procedural safeguards as well as the State and local policies to uphold them. Since that time, implementation has progressed toward its current focus on improving the quality and results of the educational experience for children and youth served under the Act. In order to support the present focus in implementation, there should be a renewed emphasis on program evaluation as a necessary tool for determining the effectiveness of special education programs and services and making informed decisions concerning program improvement. This is not to say that compliance monitoring should be discontinued. However, consideration might be given to promoting a balance between the human and fiscal resources necessary for conducting compliance monitoring and program evaluation at all levels of special education administration based upon their relative contribution to improving outcomes for children and youth with disabilities.

A related recommendation is to increase technical assistance in the area of program evaluation at the SEA and LEA levels. Expanding the focus of monitoring activities to include program evaluation, as the first recommendation suggests, will not necessarily change the amount of effort required for data collection. It has the potential, however, to make the data much more useful as long as there is a certain level of expertise available to interpret, report, and make the improvements the data suggest. For example, the documents reviewed for this study indicated that several States adopted portions of the MidSouth RRC evaluation model following technical assistance from the RRC staff. The use of this model among several States within the MidSouth region suggests that SEAs need and can benefit from technical assistance in program evaluation. Again, if the first recommendation is followed, perhaps OSEP's Division of Assistance to States could provide technical assistance in program evaluation and analyze the results of evaluation efforts nationwide.

The present language of the evaluation provisions of the Individuals with Disabilities Education Act, the General Education Provisions Act, and many supporting State statutes and/or regulations require evaluation for program effectiveness. The results from this study suggest that program evaluation should be viewed broadly if it is to be of value in answering questions of interest to all stakeholders[6]. Some of these questions undoubtedly will deal with program effectiveness, but other questions of equal importance to individuals who implement special education programs will address how these programs can be improved. Thus, a final recommendation stemming from this study is that State and Federal laws and regulation should be phrased so as to avoid restricting, or otherwise limiting, the types of program evaluations that

[6] One reviewer stressed that "all stakeholders" includes the taxpayers within a given community. Therefore, evaluation efforts must be directed toward an open discussion of who, what, where, when, and how much.

can be conducted by SEAs and LEAs. As the implementation of the IDEA continues to evolve in the coming years, the questions of critical importance to improving program quality, as well as determining program effectiveness, will need to reflect these changes. Maintaining the flexibility to address the program evaluation needs of the future will be crucial to continued progress in implementing a free and appropriate education for children and youth with disabilities.

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